



Department of Energy
Argonne Group - West
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August 27, 1999

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**SUBJECT: CENTRAL FACILITIES AREA LANDFILL ACCEPTABILITY FOR
CERCLA REMEDIAL ACTION SOIL DISPOSAL**

As part of our CERCLA Remedial Action to clean up inactive waste sites at Argonne National Laboratory-West, we need to dispose of approximately 100 cubic meters of soil from two ditches at Argonne-West. The only unacceptable risk posed by this soil is a toxic effect on small burrowing mammals due to the presence of low concentrations of metals such as chromium and mercury. Although this soil is not RCRA hazardous waste or radioactive waste, and poses no human health risks under CERCLA, the Idaho DEQ and EPA Region 10 require that it be disposed of in a landfill that complies with the Off-Site Rule (58 FR 49200). This Off-Site rule sets forth the criteria for EPA to judge the acceptability of a landfill for receiving CERCLA remediation-derived waste. EPA does not consider the CFA landfill to be off-site in relation to other INEEL facilities, however, they are requiring that the CFA landfill meet the Off-Site acceptability criteria before receiving any remediation-derived waste.

The acceptability criteria for landfills to receive nonhazardous, nonradioactive waste from CERCLA Remedial Actions are not complicated. The Off-Site Rule requires that non-RCRA landfills comply with other applicable state and federal laws, and that they control environmentally significant releases (as defined in 40 CFR 300.5) from both the receiving and non-receiving landfill units. We believe that the Industrial Waste Unit of the CFA Landfill is an acceptable disposal location for our 100 cubic meters of ditch soils. Conversations between ANL-W contractor personnel and LMITCO personnel at the CFA landfill indicate that the ditch soil meets the CFA landfill waste acceptance criteria.

Before we can ship the soil, the EPA and State will require documentation that the CFA landfill meets the Off-Site acceptability criteria for non-RCRA landfills. It is important to document that if the CFA landfill does have releases from older, inactive waste units, these releases are addressed and are in compliance with a legally binding agreement (such as the INEEL FFACO). We will also need documentation that the receiving industrial waste landfill unit will be managed and eventually closed and capped in such a manner that our ditch soils will be buried at least 4 feet below grade (to eliminate risks to small burrowing mammals). This documentation requirement could be satisfied by a letter to our office, with an attachment describing the expected closed landfill



configuration. We respectfully request that this documentation be provided to our office as soon as possible as we are funded to excavate this soil during this fiscal year.

Please contact me at 533-7446, or Greg Bass at 533-7184 if you have questions concerning this request.

A handwritten signature in black ink, reading "Mark M. Holzmer". The signature is fluid and cursive, with a long horizontal stroke at the end.

Mark M. Holzmer, Team Leader
Argonne Group-West

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